

Scott Freeman MD et al. v. Stephen Hurst et al.

2:22-cv-1433-RFB-MDC

## **Stipulation and Order to Extend Briefing Schedule**

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SCOTT FREEMAN MD, individually and as trustee for the SCOTT MITCHELL FREEMAN REVOCABLE LIVING TRUST, dated March 10, 2012, for itself and as assignee of FERDINAND BELGA,

Case No. 2:22-cv-1433-RFB-MDC

## **Stipulation and Order to Extend Briefing Schedules**

**Plaintiff,**

22.

STEPHEN HURST; NICO FORTE; CERUVIA LIFESCIENCES f/k/a CH TAC, LLC f/k/a SAVANT TAC, LLC; CAREY TURNBULL; RUSSELL BURBANK; BPM LLP; SAVANT HWP, INC.; SAVANT HWP HOLDINGS, LLC; and SAVANT ADDICTION MEDICINE, LLC,

## Defendants,

*and*

SAVANT ADDICTION MEDICINE, LLC;  
SAVANT HWP HOLDINGS, LLC; and SAVANT  
HWP, INC.,

## Nominal Defendants.



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1           **WHEREAS**, the Court previously extended the time to August 2, 2024 for  
2 Defendants to answer or otherwise respond to Plaintiff's Third Amended Complaint. *See*  
3 ECF No. 196.

4           **WHEREAS**, on July 31, 2024, Defendants Stephen Hurst and Savant HWP, Inc.  
5 filed a motion to disqualify Plaintiff's counsel, to which a response is due on  
6 August 14, 2024. *See* ECF No. 201.

7           **WHEREAS**, on August 1, 2024, Defendant Nico Forte filed a partial motion to  
8 dismiss, or alternatively, to strike the Third Amended Complaint. *See* ECF No. 202.

9           **WHEREAS**, on August 2, 2024, Defendants Nico Forte, Savant HWP, Inc., and  
10 Stephen Hurst answered and alleged counterclaims against Plaintiff. *See* ECF No. 203.

11          **WHEREAS**, on August 2, 2024, Defendants Ceruvia Lifesciences and Carey  
12 Turnball filed a motion to dismiss. *See* ECF No. 204.

13          **WHEREAS**, the undersigned parties are engaged in active settlement negotiations  
14 to fully resolve all claims and defenses and desire to conserve resources during said  
15 negotiations.

16          The undersigned parties therefore present the following proposed schedule.<sup>1</sup>

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25          <sup>1</sup> This proposed briefing schedule does not modify the deadline for Plaintiff to respond to  
Defendants Russel Burbank and BPM LLP's motion to dismiss (ECF No. 199).

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1           **IT IS HEREBY STIPULATED AND AGREED**, by and between the  
2 undersigned parties, by and through their respective counsel of record, that they will adhere  
3 to the revised briefing schedule set forth below:

Event	Current Date	New Date
Answer or Response to Third Amended Complaint for Savant LLCs	August 2, 2024	Friday, September 20, 2024
Opposition to Motion to Disqualify	August 14, 2024	Friday, September 27, 2024
Opposition to Nico Forte's Motion to Dismiss	August 15, 2024	Friday, September 27, 2024
Opposition to Ceruvia and Turnball's Motion to Dismiss	August 16, 2024	Friday, September 27, 2024
Response or Answer to Savant, Hurst, and Forte's Counterclaim	August 23, 2024	Friday, October 4, 2024

15           **IT IS FURTHER STIPULATED AND AGREED**, by and between the  
16 undersigned parties, and through their respective counsel of record, that any reply briefs  
17 associated with the extended deadlines will be filed in the normal course.  
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## Order

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE,  
UNITED STATES MAGISTRATE JUDGE

Dated: 8/8/2024

Case No.: 2:22-cv-01433-RFB-MDC

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on the 5th day of August 2024, a true and correct copy of  
 3                   the foregoing **Stipulation and Order to Extend Briefing Schedules** was served  
 4                   by the following method(s):

- 5                    **Electronic:** by submitting electronically for filing and/or service with the  
 6                   United States District Court District of Nevada's e-filing system and served  
 7                   on counsel electronically in accordance with the E-service list to the  
 8                   following email addresses:

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23                  /s/ Joyce E. Heilich

24                  An Employee of Holland & Hart LLP